

Exhibit K

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
v. :
:
USAO No. 23 Cr. 307
:
SHVARTSMAN et al., :
:
:
-----X

Recorded Conversation

Date: August 1, 2023
Time:
Session ID:
Participants: CS
Michael Park

(U/I) - UNINTELLIGIBLE
(PH) - PHONETIC SPELLING

1 [PHONE RINGING]

2 CS: Hi Mike. Mike, even.

3 PARK: Hi, Steven, how are you?

4 CS: Yeah, I'm good, thank you. Good to be back
5 in good old England after the heat in Spain.
6 It was hot.

7 PARK: I bet. It's been hot down here for sure.

8 CS: Yeah. And you have the humidity, of course,
9 eh?

10 PARK: Yep, oh yeah.

11 CS: Something to look forward to. So, yeah.
12 So, I hope you saw me message, I've received
13 the passport copies.

14 PARK: Good. If he's working on the fourth one, I
15 should have that soon, I hope.

16 CS: Okay. Okay. We probably who -- what's --
17 what nationality is the fourth one going to
18 be?

19 PARK: I don't know yet. He thinks a Canadian.
20 But you know, he's -- but, you know, I think
21 he's trying to get some input from the
22 Canadian Tax Council to make sure there's no
23 (U/I) to that guy.

24 CS: Yeah. Okay. Well, as and when if you just
25 keep sending them through, we may need

1 another copy of the guy, the third one. It
2 doesn't clearly show his date of birth, I'll
3 have a proper look at it in the morning.

4 I've just had a quick look and I saw I
5 couldn't clearly see his date of birth on
6 the passport, although, you know, it is --

7 PARK: Okay, let me know and I clean that up.

8 CS: Yeah. And then yeah, we may need a
9 translation of them, but we'll see. We'll
10 see. And we'll wait till we've got it all
11 together. Now, just crack on and get it
12 done. And if I need anything, I'll just,
13 I'll just let you know.

14 PARK: Okay.

15 CS: So.

16 PARK: And then with the, with the -- in the new
17 Nevis trust, Michael was asking, you know,
18 what's the status of them. Who's the
19 trustee? You know, if we wanted to do a
20 deal from the trust, what do we do? Because
21 he's -- he wants to -- he's got a
22 transaction, one of the other companies that
23 he owns, Rocket Financial, which he owns all
24 the stock personally, you know, obviously
25 has caused some issues for him and they're

1 trying to raise money. So, he wants to get
2 the shares out of his name, which, you know,
3 basically the CEO of the company, he's got
4 some friends, one of whom owns -- has a
5 charitable organization that can take 501,
6 you know, type donations. And so, he's
7 agreed that, you know, Michael can donate
8 the shares to him. He'll turn around and
9 sell them to the CEO of the company.

10 CS: Yep.

11 PARK: The CEO of the company will get a loan
12 directly from the trust. And, you know,
13 that'll be a convertible note. So that
14 while the, while note's outstanding, that he
15 could basically just call and convert it
16 back into shares under the trust.

17 CS: Yeah, yeah, yeah. Okay. Okay. Well, he
18 just needs to put something together
19 addressed to me and then we, you know, we
20 can do it. As I mentioned before, I need to
21 get that protocol set up with Michael. It's
22 pretty important, which obviously I want to
23 do when I'm next in Miami. I haven't
24 actually booked any travel yet. I'm just
25 trying to pull everything together so that,

1 you know, I can get round and see everybody.
2 So maybe I'll let you know -- well, I'll let
3 you know as soon as I know what my itinerary
4 is going to be like and when it's going to
5 be. But realistically, I think it's going
6 to be around the 15th. I was looking to try
7 and get across next week, but I don't think
8 it's going to materialize. It may, but
9 we'll just see what happens. But yeah, but
10 if Michael lays that out on a document and
11 if he wants to -- I suppose the best thing
12 is to send it on Signal.

13 PARK: Signal.

14 CS: Yeah.

15 PARK: Yeah.

16 CS: Yeah.

17 PARK: I can put all that together. You know, he
18 obviously just doesn't want to be the
19 trustee that's doing it.

20 CS: Yeah, yeah, yeah. And if you put --

21 PARK: So, he just wanted to verify, we've gotten
22 that done where he's no longer the trustee,
23 right?

24 CS: Yeah, absolutely. He's been totally
25 removed. I am now the trustee, obviously --

1 PARK: Okay, good.

2 CS: -- under the control of the operating
3 agreement, that you and I know Michael
4 controls it basically but yeah, but it's all
5 set up so that this sort of thing can be
6 done. We just want to put the correct
7 paperwork in place and obviously do it so
8 that there's no come back on Michael.

9 PARK: Right.

10 CS: So, yeah. So, if that's laid out and ping
11 it get across. Yeah, I'll have a look at it
12 and get cracking on it.

13 PARK: All right. And then, you know -- obviously,
14 what else do we need? I -- they asked for
15 some more stuff on the assets, but he wants
16 to get that moving. I'm probably holding
17 that up, but he wants to get the transfers
18 done so that everything's in place and we
19 open the Belize entities and get it all
20 moved.

21 CS: Yeah. Yeah.

22 PARK: How long do you think that'll take us?

23 CS: Well, once we've got all the paperwork, I
24 could say -- if we had everything in by,
25 say, the end of the week I'd say I would,

1 we'll certainly, we'll certainly have the
2 first move done within a couple of weeks.
3 So, it's a lot safer. We may even have it
4 into the Hong Kong entity where it becomes a
5 hell of a lot safer because as I discussed,
6 you know, it's China. So, in answer to
7 Michael's question for Belize, we'll get it
8 done as quickly as possible. I don't want
9 to, I don't want to give any dates. The --
10 I can't that aren't really achievable, but I
11 will try and get it all done by the end of
12 September at the latest.

13 PARK: Okay.

14 CS: I just have to push a few buttons from my
15 side and crack the whip. So yeah, but I
16 fully understand that Michael is keen to get
17 it done, and we'll just work together, and
18 get there as quickly as possible.

19 PARK: All right.

20 CS: Okay. Well, I'm going to. I'm going to put
21 my feet up for ten minutes, and then I'm
22 going to go and get some sleep. It's been a
23 hectic few days, but it's been a good few
24 days.

25 PARK: I bet.

1 CS: So, yeah.

2 PARK: We good?

3 CS: Yeah.

4 PARK: Okay.

5 CS: Okay.

6 PARK: Enjoy your evening.

7 CS: Well, I'll just wait for the document to

8 land, and then obviously I'll act on it and

9 we'll -- no doubt we'll need to speak, and

10 we'll speak throughout the week.

11 PARK: Okay. Sounds good. Thanks Steven.

12 CS: All right, Mike, take care. Thanks for the

13 call. Bye.

14 PARK: Appreciate it.

15 CS: Bye.

16 PARK: All righty, bye.

17 CS: Yeah, the time is 2159 hours. That's 2159,

18 it's actually 2200 hours, now. That's 22.

19 That's 10 p.m. on Tuesday, the 1st of August

20 2023. That was an incoming call from Mike

21 Park, I was expecting Michael Schvartsman to

22 be on the call, but he wasn't. And the

23 call's self-explanatory and the -- he's

24 asked for tight deadlines and timeframes in

25 terms of getting everything into to Belize

1 through the structure that we've agreed, and
2 it's self-explanatory. And on that basis, I
3 am going to switch it off at 2200, 10 p.m.
4 And it's UK time, British Summertime.

5 [END OF RECORDING]

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
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v. :
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USAO No. 23 Cr. 307
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SHVARTSMAN et al., :
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Recorded Conversation

Date: August 9, 2023
Time:
Session ID:
Participants: CS
Michael Shvartsman

(U/I) - UNINTELLIGIBLE
(PH) - PHONETIC SPELLING

1 CS: Hi, Michael.

2 SHVARTSMAN: How are you?

3 CS: I'm good, thanks. You?

4 SHVARTSMAN: Good, I'm good, thanks. Hey, let me ask a
5 question. Are you, are you the trustee of
6 the Nevis trust?

7 CS: Yeah.

8 SHVARTSMAN: Okay, so if I need to, if I need to set up a
9 company under that Nevis trust right now, or
10 bank accounts, that you're going to have to
11 sign this stuff, right?

12 CS: Well, you can do it, and then I can sign
13 whatever. It's your -- you know, what --
14 how are you going to do it? Are you going
15 to do it in your name? Or in --

16 SHVARTSMAN: No, it's going, no, it's going to be in the
17 trust's name.

18 CS: Yeah. Okay. Okay.

19 SHVARTSMAN: So, you're going to have, you're going to
20 have to sign for it.

21 CS: Yeah.

22 SHVARTSMAN: All right, let me figure it out. So, I
23 might need you to sign some stuff.

24 CS: Potentially, yeah. Do you know what
25 specifically what you want to do?

1 SHVARTSMAN: Well, I want to -- we've got a company that
2 I own that owns a bunch of vehicles.

3 CS: Yeah.

4 SHVARTSMAN: So, I think I want to transfer the trust, so
5 that -- it's a, it's a Montana Company.

6 CS: Yeah.

7 SHVARTSMAN: So, they want to transfer that to the trust
8 so that trust will own that company that
9 owns a bunch of vehicles. So --

10 CS: Okay.

11 SHVARTSMAN: -- I might have to do -- yeah, like, a
12 purchase and sale agreement, you're going to
13 have to sign on behalf of trust.

14 CS: Well, why don't we -- if it's set up, in
15 whoever is going to be the shareholder
16 stroke director, why don't you set it up and
17 we keep it outside. And then when we do the
18 -- when the Full Singapore gets into full
19 swing, we just move it into Belize with the
20 rest?

21 SHVARTSMAN: So, what you're saying -- well, it's already
22 set up, so just leave it as?

23 CS: Yeah.

24 SHVARTSMAN: And then just move it into Belize. Okay,
25 fine.

1 CS: Yeah, yeah. That'll keep it simple and
2 obviously more secure. And --

3 SHVARTSMAN: (U/I).

4 CS: If you just send me the details by Signal,
5 preferably, obviously. And then I will
6 include it in the, in the Full Singapore.
7 I've just spoke with Mike. In fact, I just
8 texted, you know, asking for a few things
9 misering him, burdening him. But I'm just
10 mindful. I want to, I want to get --

11 SHVARTSMAN: Yeah, we want to get this thing going.

12 CS: Absolutely. And I don't, I don't know if
13 you saw me text, I've just sent a text. I'm
14 going to be in Miami on -- a week on --

15 SHVARTSMAN: Yeah, let's get together.

16 CS: Shall we do lunch?

17 SHVARTSMAN: Sure. Yeah, let's do lunch.

18 CS: Yeah, that place we -- you and I went last
19 time with Eric was nice, shall we do that?

20 SHVARTSMAN: Yeah, sure. First, give me a call when you
21 get in, we'll figure it out, okay?

22 CS: Okay. And if you want to send me those
23 details, excuse me, in the meantime, feel
24 free or we can discuss it when I see you
25 next week or the week after, should I say.

1 SHVARTSMAN: Okay, sounds good.

2 CS: All right, Michael.

3 SHVARTSMAN: Thanks, Steven, take care.

4 CS: You take care, cheers. Bye.

5 SHVARTSMAN: Thank you. Thanks.

6 CS: Yeah, the time is 1623 hours. That's 4:23

7 p.m. on Wednesday the 9th of August 2023.

8 I'm going to -- I've just received an

9 incoming call from Michael Schvartsman a few

10 moments ago. I sent a text to him telling

11 him I'm going to be in Miami the week after

12 next, and we could do -- we can -- said that

13 it would be nice to get together for a catch

14 up and lunch. And I've also sent Mike Park

15 a text by what -- by Signal and ask him for

16 some things in response to a spreadsheet of

17 entities that he sent to John. And I've

18 been asking for some specific details.

19 Michael called me just then and the call was

20 self-explanatory. He's got a, he's got a

21 vehicle and he's got a corporation company

22 registered in Montana that he wishes to put

23 into the trust. And what I've suggested to

24 him is that rather than move it and we put

25 it into Nevis, we just put it into Belize

1 where the rest of his assets are going to
2 be. He's told me the corporation owns some
3 vehicles and he's either going to send them
4 to me or he's going to, he's going to
5 provide me with them when we have lunch in
6 Miami a week on, a week on Tuesday or
7 Wednesday. And the time is now 1624, 4:24
8 p.m. British Summer Time, it's still
9 Wednesday the 9th of August 2023 and I'm
10 going to switch it off.

11 [END OF RECORDING]

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